

SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
3 World Financial Center, Suite 400
New York, New York 10281-1022
(212) 336-1100

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

GALLEON MANAGEMENT, LP,
RAJ RAJARATNAM,
RAJIV GOEL,
ANIL KUMAR,
DANIELLE CHIESI,
MARK KURLAND,
ROBERT MOFFAT,
NEW CASTLE FUNDS LLC,
ROOMY KHAN,
DEEP SHAH,
ALI HARIRI,
ZVI GOFFER,
DAVID PLATE,
GAUTHAM SHANKAR,
SCHOTTENFELD GROUP LLC,
STEVEN FORTUNA,
and
S2 CAPITAL MANAGEMENT, LP,

Defendants.

09 Civ. 8811
(JSR)

ECF CASE

NOTICE OF PLAINTIFF'S RENEWED MOTION TO COMPEL PRODUCTION
OF RELEVANT, LEGALLY OBTAINED WIRETAPPED COMMUNICATIONS

PLEASE TAKE NOTICE that, upon the accompany Memorandum of Law, and
all prior pleadings and proceedings had herein, Plaintiff Securities and Exchange
Commission ("Commission"), by its attorneys, will move this Court, before the

Honorable Jed S. Rakoff, at the United States District Court, Southern District of New York, United States Courthouse, 500 Pearl Street, New York, NY, 10007, at a hearing scheduled by the Court at 5:00 p.m. on January 20, 2011, for an Order, pursuant to Federal Rules of Civil Procedure 26 and 34, compelling Defendants Raj Rajaratnam and Danielle Chiesi to immediately produce to the Commission all relevant wiretapped communications in their possession, custody, or control, and corresponding line sheets, summaries and transcripts that were produced to them by the United States Attorney's Office for the Southern District of New York, and for such other and further relief as this Court deems just and proper. By previous order of the Court, Defendants' Oppositions to this Motion are due January 5, 2011, and the Commission's Reply is due January 12, 2011.

Dated: New York, New York
December 17, 2010

s/Kevin P. McGrath
s/Valerie A. Szczepanik

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2010, the foregoing document and accompanying Memorandum of Law was filed with the Clerk of the Court and served via ECF and email upon counsel to the following parties and participants:

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